

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	No. 3:18-CR-0097
v.	:	
	:	(Judge Mariani)
ROSS ROGGIO, and	:	
ROGGIO CONSULTING Co, LLC	:	
Defendants.	:	(electronically filed)

**GOVERNMENT'S NOTICE OF INTENT
TO USE RULE 404(b) TYPE EVIDENCE**

The United States, by and through undersigned counsel, hereby gives notice, pursuant to Federal Rule of Evidence 404(b), that it may seek at trial to introduce the following statements and other wrongs or acts of the defendant. The government believes that these statements/acts are admissible independent of Rule 404(b) as being intrinsic to proving the offenses charged, but is filing this notice out of an abundance of caution.

1. The defendant's manipulation and intimidation of his employees in the Kurdistan region of Iraq included coercing some female employees into having involuntary sexual relations with him.

2. The defendant was unable to purchase weapons parts from one U.S. company because of his past business dealings with that

company.

3. The defendant was unable to produce the quantity and quality of weapons that Kurdish officials were paying his company to produce in part because the defendant diverted funds from the project to pay past business debts.

4. In April 2016, the defendant arranged for Kurdish soldiers to abduct an employee from the firearms factory, place a bag over his head, forcibly detain the employee at a Kurdish military compound for more than one day, and potentially subject the employee to physical and mental abuse. One of the Kurdish soldiers who abducted this employee was named “Goran” and was also involved in the abduction, detention, and torture alleged in Counts One and Two of the Superseding Indictment.

Dated: April 22, 2023

Respectfully submitted,

GERARD M. KARAM
UNITED STATES ATTORNEY

/s/ Todd K. Hinkley
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on April 22, 2023, he served a copy of the above document via ECF on Gino Bartolai, Esq., counsel for defendants.

s/ Todd K. Hinkley
TODD K. HINKLEY
Assistant U.S. Attorney